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August 7, 2025

The Honorable Margaret M. Garnett
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 1007

*Re: Request to Extend Deadline to Respond to Supplemental Motions to Dismiss
Range, Jr. v. Flemington Estates LLC et al; Civil Case No: 1:25-cv-02633*

Dear Judge Garnett:

Hanski Partners represents Plaintiff King Range, Jr. in the above-referenced action. We write to respectfully request a 14-day extension of the deadline to file Plaintiff's consolidated response to Defendants' supplemental motions to dismiss, from August 8, 2025 to August 22, 2025.

We make this request as the undersigned, Adam Hanski, has been dealing with a family matter concerning an elderly parent, that has severely impacted his working hours. The extent of time required to assist his parent was unexpected, and the need for the request was not realized until today. The current deadline is August 8, 2025.

This is the first request to extend the deadline to file Plaintiff's consolidated response to Defendants' supplemental motions to dismiss. However, to allow for a combined response to Defendants' supplemental motions to dismiss, on July 20, 2025, Dkt No. 24, Plaintiff asked the Court to extend the deadline to respond to Defendant Flemington Estates' supplemental motion to dismiss. The request asked the Court to set August 8, 2025 as the date for Plaintiff to respond to Defendant Flemington Estates' supplemental motion, and any motion to dismiss filed by Defendant Frankie Shop, LLC. On July 21, 2025 the Court granted Plaintiff's request. Dkt No. 25.

Both Defendants consent to the requested extension. The proposed alternative deadline is August 22, 2025. No other scheduled dates are affected by the requested extension.

As noted, the need for an extension was not expected, therefore it is made within two business days before the filing deadline. Nevertheless, apologies for the belated request.

Thank you for your time and attention to this matter.

Respectfully,

/s/ Adam S. Hanski

Adam S. Hanski, Esq.